# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

AUTOMOTIVE TECHNOLOGIES	)	
INTERNATIONAL, INC.,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 06-187-GMS
v.	)	
	)	
AMERICAN HONDA MOTOR COMPANY,	)	
INC., ELESYS NORTH AMERICA, INC.,	)	
and GENERAL MOTORS CORPORATION,	)	

Defendants.

### **DEFENDANTS' MOTION TO TRANSFER**

Defendants American Honda Motor Company, Elesys North America, Inc. and General Motors Corporation hereby move to transfer this action pursuant to 28 U.S.C. § 1404(a) to the Eastern District of Michigan. The grounds for this motion are set forth in defendants' opening brief and supporting declarations, filed herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Thomas C. Grimm

OF COUNSEL:

Timothy Q. Delaney Ralph J. Gabric Miyoung Shin Rickard DeMille BRINKS HOFER GILSON & LIONE NBC Tower - Suite 3600 455 North Cityfront Plaza Drive Chicago, IL 60611 (312) 321-4200

June 7, 2006 523301

Thomas C. Grimm (#1098)
Benjamin J. Schladweiler (#4601)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899-1347
tgrimm@mnat.com
bschladweiler@mnat.com
(302) 658-9200
Attorneys for Defendants

# **RULE 7.1.1 CERTIFICATE**

The undersigned counsel for defendants certifies that counsel for defendants spoke with counsel for plaintiff who indicated that plaintiff would oppose defendants' motion to transfer.

/s/ Thomas C. Grimm

Thomas C. Grimm (#1098) tgrimm@mnat.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 7, 2006, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

> Richard K. Herrmann, Esquire MORRIS, JAMES, HITCHENS & WILLIAMS LLP

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on June 7, 2006 upon the following individuals in the manner indicated:

#### **BY HAND**

Richard K. Herrmann, Esquire MORRIS, JAMES, HITCHENS & WILLIAMS LLP 222 Delaware Avenue, 10th Floor Wilmington, DE 19801

## **BY FEDERAL EXPRESS**

Andrew Kochanowski, Esquire SOMMERS SCHWARTZ, P.C. 2000 Town Center, Suite 900 Southfield, MI 48075

Michael H. Baniak, Esquire BANIAK PINE & GANNON 150 N. Wacker Drive, Suite 1200 Chicago, IL 60606

/s/ Thomas C. Grimm

Thomas C. Grimm (#1098) tgrimm@mnat.com